

LABATON KELLER SUCHAROW LLP

Thomas A. Dubbs (*pro hac vice*)
Carol C. Villegas (*pro hac vice*)
Michael P. Canty (*pro hac vice*)
Thomas G. Hoffman, Jr. (*pro hac vice*)
140 Broadway
New York, New York 10005

*Lead Counsel to Securities Lead Plaintiff and
the Class*

MICHELSON LAW GROUP

Randy Michelson (SBN 114095)
220 Montgomery Street, Suite 2100
San Francisco, California 94104

*Local Bankruptcy Counsel to Securities Lead
Plaintiff and the Class*

LOWENSTEIN SANDLER LLP

Michael S. Etkin (*pro hac vice*)
Andrew Behlmann (*pro hac vice*)
Scott Cargill (*pro hac vice*)
Colleen Restel
One Lowenstein Drive
Roseland, New Jersey 07068

*Special Bankruptcy Counsel to Securities
Lead Plaintiff and the Class*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

☒ Affects Both Debtors

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**DECLARATION OF MICHAEL S. ETKIN IN
SUPPORT OF MOTION OF SECURITIES
LEAD PLAINTIFF PURSUANT TO B.L.R.
9006-1 TO EXTEND TIME TO FILE
RESPONSE TO CERTAIN CLAIM
OBJECTIONS**

Related Document: Dkt Nos. 14186, 14189,
14193, 14196, 14210, 14213

(No hearing set)

I, Michael S. Etkin, Esq., hereby declare as follows, pursuant to 28 U.S.C. § 1746:

1. I am a Partner of the law firm of Lowenstein Sandler LLP, special bankruptcy counsel in these chapter 11 cases of the above-captioned reorganized debtors (the “**Reorganized Debtors**”) to Public Employees Retirement Association of New Mexico (“**Lead Plaintiff**” or “**PERA**”), the court-appointed lead plaintiff.

DECLARATION OF MICHAEL S. ETKIN IN SUPPORT OF MOTION OF SECURITIES LEAD PLAINTIFF PURSUANT TO B.L.R.
9006-1 TO EXTEND TIME TO FILE RESPONSE TO CERTAIN CLAIM OBJECTIONS

1 2. I submit this Declaration in support of the *Motion of Securities Lead Plaintiff Pursuant*
2 *to B.L.R. 9006-1 to Extend Time to File Response to Certain Claim Objections* (the “**Motion to**
3 **Extend Time**”) filed contemporaneously herewith.¹ Except as otherwise indicated herein, the
4 facts set forth in this Declaration are based upon my personal knowledge, information provided to
5 me by Lead Plaintiff, or based upon my knowledge and belief. I am authorized to submit this
6 Declaration on behalf of Lead Plaintiff.

7 3. In the Motion to Extend Time, Lead Plaintiff requests entry of an order briefly
8 extending the time for Lead Plaintiff to file a response to the Claim Objections only with respect
9 to the Adopting Securities Claimants. Specifically, Lead Plaintiff requests that the deadline for
10 filing a response to the Claim Objections, only with respect to the Adopting Securities Claimants,
11 be extended by three days, from March 12, 2024 to March 15, 2024, so that it is the same date as
12 PERA’s response deadline to the PERA Claim Objection.

13 4. On December 13, 2023, the Reorganized Debtors filed the Claim Objections and the
14 PERA Claim Objection. The deadline to object to the PERA Claim Objection is currently March
15 15, 2024.

16 5. On February 9, 2024, at the request of PERA, the Court held a status conference
17 following entry of the Court’s *Order Granting Motion for Appointment as Lead Plaintiff and*
18 *Approval of Selection of Counsel* [Dkt. No. 14300]. Following the status conference, the Court
19 entered the February 9 Order. The February 9 Order, which extended the deadline for parties,
20 including Lead Plaintiff, to object to the Claim Objections to March 12, 2024, and set a hearing
21 on the Claim Objections for March 26, 2024.

22 6. Subsequent to entry of the February 9 Order, PERA’s counsel communicated with
23 certain securities claimants that were the subject of the Claims Objections though notices that were
24 sent via email and letter offering such securities claimants the opportunity to adopt PERA’s third
25 amended complaint and join in Lead Plaintiff’s opposition to the PERA Claim Objection in

26 ¹ Capitalized terms not defined herein shall have the meaning set forth in the Motion to Extend
27 Time.

1 opposing the Claim Objections. Such communications were consistent with the Court's directions
2 at the February 9th status conference and with the Court's relevant orders. Annexed hereto as
3 Exhibit A is a list of the Adopting Securities Claimants and their respective claim numbers, which
4 parties have agreed to adopt PERA's third amended complaint and to rely on PERA's response to
5 the Claim Objections with respect to substantive federal securities laws allegations.²

6 7. Lead Plaintiff intends to file a single omnibus response to the Claim Objections, solely
7 with respect to the Adopting Securities Claimants, and to the PERA Claim Objection and all
8 claimants subject to the PERA Claim Objection. Lead Plaintiff submits that filing a consolidated
9 response to the PERA Claim Objection and to the Claim Objections, only with respect to the
10 Adopting Securities Claimants, on the same March 15, 2024 deadline established for the PERA
11 Claim Objection, will eliminate the risk to the Adopting Securities Claimants that the current three
12 day gap creates and provide a streamlined and efficient procedure for addressing the PERA Claim
13 Objection and with respect to the Adopting Securities Claimants. PERA further requests that any
14 hearing to consider the Claim Objections with respect to the Adopting Securities Claimants' claims
15 be scheduled for the same date as any hearing scheduled to consider the PERA Claim Objection.

16 8. On March 8, 2024, Lead Plaintiff requested that the Reorganized Debtors consent to
17 the relief requested in the Motion to Extend. As of the date and time of filing the Motion to Extend,
18 the Reorganized Debtors indicated that they are considering this request.

19 I declare under penalty of perjury that the foregoing is true and correct.

20
21
22 Dated: March 10, 2024

By: /s/ Michael S. Etkin
Michael S. Etkin

23
24
25
26 ² Lead Plaintiff anticipates supplementing the list of Adopting Securities Claimants as further
27 responses are received over the next several days.

Exhibit A

Adopting Securities Claimants

PG&E Claim No.	Securities Claimant
103818	JOHN C & BETTY J DIEKMANN TR UA NOV 29 1991
97765	ROBERT SCHOOLER
98483	MARY ELLEN HELLER MARITAL TRUST #2
99104	JAMES MORANDO
98864	DUVAL DICKEY
102688	LINDA GAYLE HOWIT
103872	ADA MAYERS
103872	ADA MAYERS
99724	LUCENT TECH INC. DEFINED CONT PLAN MASTER TR NOKIA ATTN SHANNON MATARAZZO
99426	LUCENT TECHNOLOGIES INC. MASTER PENSION TRUST NOKIA CARE OF SHANNON MATARAZZO
98871	MASON TENDERS DISTRICT COUNCIL ANNUITY FUND ANNA GUTSIN
99852	BRUCE ALLEN DAVIS IRA
100515	FEDERICO P COVARRUBIAS AND MARIA
100532	MICKEY M. CARROLL
100524	MICKEY M. CARROLL
99424	MALCOLM IAN MCLEAN
100037	JESSICA LEA IRBY